

**MEMO ENDORSED**

MICHAEL A. CARDOZO  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

JEFFREY C. BROOKS  
Assistant Corporation Counsel  
Tel.: (212) 788-9736  
Fax: (212) 788-9776  
Email: jbrooks@law.nyc.gov

LEAD CASE 04 CIV 7922 (RJS)(JCF)  
FILE ALSO IN 04 CIV 7921 (RJS)(JCF)  
AND ALL CASES LISTED IN  
June 3, 2008

**BY FACSIMILE**

Honorable James C. Francis IV  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Room 1960  
New York, New York 10007-1312

APPENDIX  
A

USDS SDNY  
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Re: RNC Consolidated Cases

Dear Judge Francis:

I write in reference to motions filed by defendants on January 22, 2008 in thirty-eight of the RNC-related actions consolidated before Your Honor for discovery. These applications were omnibus motions to compel certain discovery from the plaintiffs in these actions. A list of the cases in which these motions were filed is annexed hereto as Appendix A.

At the last status conference, Your Honor stated that the parties could choose whether they wanted to file these motions with the Clerk of the Court. Defendants seek to file these motions with the Clerk, and therefore respectfully request that Your Honor enter an order permitting defendants to file their January 22, 2008 case-specific motions and any replies thereto under seal. As the Court is aware, sealing is required because in these case-specific applications defendants moved for, *inter alia*, orders compelling certain plaintiffs to produce releases for access to their mental health and medical treatment records and, in so moving, discussed various plaintiffs' histories.

Respectfully submitted,

Jeffrey C. Brooks

cc: RNC Distribution List (via email)

6/3/08  
Application granted. Any letters  
related to these applications may be  
filed under seal.  
SO ORDERED.  
James C. Francis IV  
USMJ

Abdell, Tarasik, et al. v. City of New York, et al., 05 CV 8453 (RJS) (JCF)  
Adams, Courtney Lee, et al. v. City of New York, et al., 05 CV 9484 (RJS) (JCF)  
Araneda, Barbara, et al. v. City of New York, et al., 05 CV 9738 (RJS) (JCF)  
Banno, Yusuke v. City of New York, et al., 06 CV 2270 (RJS) (JCF)  
Bastidas, Betty, et al. v. City of New York, et al., 05 CV 7670 (RJS) (JCF)  
Biddle, Jeremy, et al. v. City of New York, et al., 05 CV 1570 (RJS) (JCF)  
Botbol, Sacha, et al. v. City of New York, et al., 05 CV 1572 (RJS) (JCF)  
Bunim, Sharone, et al. v. City of New York, et al., 05 CV 1562 (RJS) (JCF)  
Coburn, Sarah, et al. v. City of New York, et al., 05 CV 7623 (RJS) (JCF)  
Conlev, Brian v. City of New York, et al., 05 CV 10024 (RJS) (JCF)  
Crotty, Emilia, et al. v. City of New York, et al., 05 CV 7577 (RJS) (JCF)  
Drescher, Udo v. City of New York, et al., 05 CV 7541 (RJS) (JCF)  
Dudek, Carol v. City of New York, et al., 04 CV 10178 (RJS) (JCF)  
Eastwood, Corey, et al. v. City of New York, et al., 05 CV 9483 (RJS) (JCF)  
Galitzer, Gwynn v. City of New York, et al., 05 CV 7669 (RJS) (JCF)  
Garbini, Adrienne, et al. v. City of New York, et al., 05 CV 1565 (RJS) (JCF)  
Greenwald, Adam, et al. v. City of New York, et al., 05 CV 1566 (RJS) (JCF)  
Kalra, Ritu, et al. v. City of New York, et al., 05 CV 1563 (RJS) (JCF)  
Karlin, Annette v. City of New York, et al., 05 CV 7789 (RJS) (JCF)  
Lahn-Sheen Lee, Jeanette v. City of New York, et al., 05 CV 5528 (RJS) (JCF)  
Lalier, Kathleen, et al. v. City of New York, et al., 05 CV 7580 (RJS) (JCF)  
Macnamara, Deirdre, et al. v. City of New York, et al., 04 CV 9216 (RJS) (JCF)  
Martini, John v. City of New York, et al., 05 CV 9881 (RJS) (JCF)  
Meehan, Alison, et al. v. City of New York, et al., 05 CV 5268 (RJS) (JCF)

Pagoda, John v. City of New York, et al., 05 CV 7546 (RJS) (JCF)

Phillips, Jeffrey, et al. v. City of New York, et al., 05 CV 7624 (RJS) (JCF)

Pickett, Brian, et al. v. City of New York, et al., 05 CV 1567 (RJS) (JCF)

Portera, Brian v. City of New York, et al., 05 CV 9985 (RJS) (JCF)

Rechtschaffer, Jessica v. City of New York, et al., 05 CV 9930 (RJS) (JCF)

Remmes, Chris v. Chapman, Mark, et al., 05 CV 9940 (RJS) (JCF)

Ryan, Lindsay, et al. v. City of New York, et al., 05 CV 1564 (RJS) (JCF)

Sloan, Emily, et al. v. City of New York, et al., 05 CV 7668 (RJS) (JCF)

Smith, Matthew v. City of New York, et al., 06 CV 1779 (RJS) (JCF)

Stark, Jeffrey, et al. v. City of New York, et al., 05 CV 7579 (RJS) (JCF)

Tikkun, Kaitlyn v. City of New York, et al., 05 CV 9901 (RJS) (JCF)

Tremayne, Wendy, et al. v. City of New York, et al., 05 CV 1568 (RJS)(JCF)

Xu, Randy, et al. v. City of New York, et al., 05 CV 7672 (RJS) (JCF)